

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

OF THE STATE OF OREGON

IN THE MATTER OF:) FINAL ORDER TO REQUIRE COMPLIANCE
Gas Transmission Northwest LLC) WITH ROUND II OF REGIONAL HAZE
Compressor Station #13)
Respondent.) CASE NO. AQ/RH-HQ-2021-140

I. AUTHORITY

The Department of Environmental Quality (DEQ) issues this Final Order (Notice) pursuant to Oregon Revised Statutes (ORS) 468A.025, and Oregon Administrative Rules (OAR) Chapter 340, Divisions 011 and 223.

II. FINDINGS OF FACT

1. Respondent, Gas Transmission Northwest LLC, operates a natural gas compressor station located at 1/4 mile west of Diamond Lake Junction in Chemult, Oregon (the Facility).

2. On April 9, 1996, DEQ issued Title V Operating Permit No. 18-0096-TV-01 (the Permit) to Respondent.

3. On July 11, 2018, DEQ renewed the Permit.

4. The Permit authorizes Respondent to discharge air contaminants associated with its operation of the Facility in conformance with the requirements, limitations, and conditions set forth in the Permit.

5. Turbines 13C and 13D at the Facility are emission units, as defined in OAR 340-223-0020(1).

6. On December 31, 2017, the Permit had the following plant site emissions limit (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen oxides (NO_x), which constitute round II regional haze pollutants, see OAR 340-223-0020(2), at the Facility: 39 tons per year for SO₂, 14 tons per year for PM₁₀, and 244 tons per year for NO_x.

7. The Facility is located 30.4 kilometers from the Three Sisters Wilderness Area, which is the nearest Class I Area, see OAR 340-200-0020(25), measured in a straight line from the Facility to the Class I Area.

1 8. On December 31, 2019, DEQ sent a request for information request to Respondent,
2 pursuant to OAR 340-214-0110, to complete a Four Factor Analysis (FFA) for round II of regional
3 haze.

4 9. On May 12, 2020, Respondent submitted a FFA to DEQ, identifying the cost of controls
5 for the Facility to reduce round II regional haze pollutants.

6 10. On August 14, 2020, DEQ requested additional information from Respondent regarding
7 their FFA submittal.

8 11. On January 21, 2021, DEQ concurred with Respondent's findings in the May 12, 2020
9 FFA that control of NOx by Selective Catalytic Reduction (SCR) is cost effective for Turbines 13C and
10 13D at the Facility.

11 12. On August 3, 2021, Respondent submitted a final control cost calculation. DEQ adjusted
12 the calculations pursuant to OAR 340-223-0120(2), OAR 340-223-0120(3) and OAR 340-223-0120(4),
13 which showed that control of NOx by Selective Catalytic Reduction (SCR) is cost effective for
14 Turbines 13C and 13D at the Facility. The final cost calculation is attached as Exhibit A and is
15 incorporated as part of this Order.

16 III. FINDINGS OF FACT AND CONCLUSIONS OF LAW

17 1. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q value is
18 277; d value is 14.1, and ratio of Q divided by d is 19.68.

19 2. Because the Facility has a Title V operating permit and because the Facility has a Q/d value
20 of greater than 5.00, the Facility is subject to the requirements of round II of regional haze. *See* OAR 340-
21 223-0100(1).

22 3. As of the date of this Order, DEQ and Respondent have not entered into a stipulated
23 agreement and final order under OAR 340-223-0110(2).

24 4. After review and consideration of all the data submitted by the Facility and based on
25 adjustments by DEQ to Respondent's FFA pursuant to OAR 340-223-0120(2) and (3), DEQ has
26 determined that the Respondent identified control devices that would reduce round II regional haze
27 pollutants with a cost effectiveness below the cost threshold identified in OAR 340-223-0120(4)(a).

IV. ORDER REQUIRING COMPLIANCE WITH ROUND II OF REGIONAL HAZE

Based upon the foregoing FINDINGS OF FACT AND CONCLUSIONS OF LAW, and pursuant to OAR 340-223-0130(1), Respondent is hereby ORDERED TO:

1. By July 31, 2023, Respondent shall submit to DEQ a complete and approvable permit application to incorporate appropriate and required permit conditions for the installation and operation of Selective Catalytic Reduction (SCR) and Continuous Emissions Monitoring System (CEMS) on Turbines 13C and 13D.
2. By July 31, 2024, install a CEMS on Turbines 13C and 13D to measure the emissions of NO_x.
 - a. Respondent shall demonstrate proper installation of the CEMS following EPA Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1), Performance Specification 2 (see 40 CFR 60, Appendix B, Performance Specification 2), and DEQ Continuous Monitoring Manual, Rev. 2015; and
 - b. Respondent shall submit data collected during testing identified in Section IV.1.a of this Final Order to DEQ for review and to determine if the CEMS was installed correctly and meets the identified quality assurance criteria.
3. By July 31, 2026, install, maintain, and continuously operate SCR on Turbines 13C and 13D with a minimum control efficiency of 90%.
4. Respondent shall not operate Turbines 13C and 13D after August 1, 2026, unless the SCR is properly operating.

V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

You have a right to a contested case hearing on this Order, if you request one in writing. DEQ must receive your request for hearing **within 10 calendar days** from the date you receive this Order. If you have any affirmative defenses or wish to dispute any allegations of fact in this Order, you must do so in your request for hearing, as factual matters not denied will be considered admitted, and failure to raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for further information about requests for hearing.) You must send your request to: **DEQ, Office of Compliance and Enforcement, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax it to **503-229-6762** or email it to DEQappeals@deg.state.or.us. An administrative law judge employed by the Office of Administrative

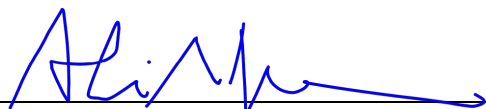
1 Hearings will conduct the hearing, according to ORS Chapter 183, OAR Chapter 340, Division 011 and
2 OAR 137-003-0501 to 0700. You have a right to be represented by an attorney at the hearing, however
3 you are not required to be. If you are an individual, you may represent yourself. If you are a
4 corporation, partnership, limited liability company, unincorporated association, trust or government
5 body, you must be represented by an attorney or a duly authorized representative, as set forth in OAR
6 137-003-0555.

7 Active duty Service members have a right to stay proceedings under the federal Service
8 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-
9 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed
10 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military
11 Department does not have a toll free telephone number.

12 If you fail to file a timely request for hearing, the Order will become a final order by default
13 without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later
14 withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the
15 hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates
16 the relevant portions of its files, including information submitted by you, as the record for purposes of
17 proving a prima facie case.

18
19
20 8/9/2021

21 Date

22 
23 Ali Mirzakhali, Air Quality Administrator
24 Oregon Department of Environmental Quality
25
26
27